



**Jerald N. Fritz**  
Senior Vice President  
Legal and Strategic Affairs  
Tel: (703) 647-8747  
Fax: (703) 647-8740  
jfritz@allbrittontv.com

February 27, 2012

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Standardized and Enhanced Disclosure Requirements for Television Broadcast  
Licensee Public Interest Obligations, MM Docket No. 00-168**

Dear Ms. Dortch:

In compliance with Section 1.1206(b) of the Commission's rules, the undersigned submits this *ex parte* notice relating to the above-captioned proceeding.

On February 27, 2012, the undersigned had a telephone conversation with Erin McGrath, Media Legal Advisor to Commissioner Robert McDowell, regarding potential action to require online filing of television stations' Public Inspection Files.

Reference was made to comments filed in the docket and a previous presentation to the Commission Staff. Ms. McGrath was urged to give careful scrutiny to any new requirement that stations do more than simply upload current paper Public File documents to a website.

The Commission should resist the temptation to expand the obligations relating to posting currently required public file material to new information or partial summaries. If the government seeks to remedy perceived problems with campaign funding by requiring additional information from only one sector of the political sphere, it should undertake a rulemaking proceeding on that issue and not use the ministerial nature of the broadcaster's Public File to address those issues through the back door.

Additionally, given the Commission's experience with online submissions to a website hosted by the agency, the Commission should seriously consider not expending the funds to develop and host a one-size-fits-all website. Stations have experience in maintaining their own websites and could, with relative ease, accommodate links to filed documents as they exist in paper form. Such a system would provide the viewing public access to what it has today if viewers visited the stations. With respect to the political section of the Public File, the Commission should rely on the findings it made four years ago and retain the requirement that they be maintained at the station only.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above-referenced docket. Please contact the undersigned should you have any questions regarding this matter.

Sincerely,

Jerald N. Fritz  
Senior Vice President,  
Legal and Strategic Affairs

cc: Erin McGrath